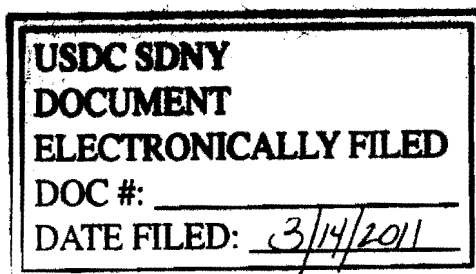
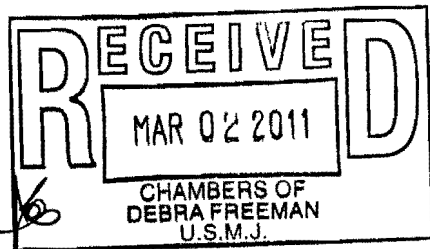




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March 2, 2011

Via Fax – 212.805.4258

Hon. Debra Freeman  
United States District Judge  
500 Pearl Street  
New York, New York 10007-1312

Re: *Zuo Kaspersky Lab v. Tall Licensing Limited et al.*, 09-cv-3167

Dear Judge Freeman:

We represent the defendants in the referenced action. In the course of our last telephone conference with the Court on February 15, 2011, the parties' counsel advised that the parties had reached a settlement in principle and were working through the final procedural details, which included defendants obtaining a letter of credit. The Court requested that the parties submit a stipulation of dismissal by the end of February or otherwise advise the Court if more time is needed.

We are writing now, with the consent of plaintiff's counsel, to advise that the parties, in fact, will require additional time to finalize the settlement. This is due to the fact that the entity that defendants initially believed would be able to issue an acceptable letter of credit was unable to do so. At plaintiff's urging, defendants have now applied to an FDIC-insured bank for the letter of credit, but the bank requires audited financial statement from defendants' business. Defendants are in the process of working with their accountants to secure the audited financials, and it is believed that they will be prepared within two weeks. Allowing for additional time thereafter to secure the letter of credit (or secure alternative security acceptable to plaintiff) and finalize the settlement documents, the parties respectfully request that the Court continue to suspend the requirement to complete discovery until April 15, 2011, with the anticipation that the parties will be in a position to file a Stipulation of Dismissal prior thereto.

SO ORDERED: DATE: 3/14/11

.....  
DEBRA FREEMAN  
UNITED STATES MAGISTRATE JUDGE

*granted - this may be settled by April 15, counsel shall provide the court with a joint status letter by that date.*



We appreciate your consideration of this request. Please let us know if you require any additional information.

Respectfully submitted,

PRYOR CASHMAN LLP

A handwritten signature in black ink, appearing to read "John J. Lynch", written over a horizontal line.

By: John J. Lynch

c: Counsel for plaintiff